



Tulane Environmental Law Clinic

July 16, 2015

By email to: deidra.johnson@la.gov

Deidra Johnson, Attorney Supervisor
Office of the Secretary, Legal Division
P.O. Box 4302
Baton Rouge, LA 70821-4302

Re: Request for Extension of Time to Submit Comments on LDEQ's June 20, 2015, Notice of Intent to amend the Dissolved Oxygen (DO) Criteria for Water Quality Subsegments in the Eastern Lower Mississippi River Alluvial Plains (LMRAP) Ecoregion (WQ 091)

Dear Ms. Johnson:

On behalf of the Gulf Restoration Network (GRN), we request a 30-day extension of time to submit comments on WQ 091 – LDEQ's proposed amendment of the DO Criteria for Water Quality Subsegments in the Eastern Lower Mississippi River Alluvial Plains Ecoregion.

More time is necessary to evaluate this broad and far-reaching drastic change to the DO criteria. The proposed changes in the Dissolved Oxygen criteria cover thirty-one different subsegments and cumulatively hundreds of stream miles. Additionally, subsegments are being redrawn, complicating evaluation of the proposal. Further, LDEQ's proposal is partially based on a Use Attainability Analysis completed in 2008, in addition to a limited more recent UAA; therefore, both sets of information must be evaluated.

Last, GRN requested the documentation underlying this rule change via a Public Records Request to LDEQ. Yesterday, LDEQ provided GRN with this documentation. It consists of 19 PDF documents totaling 1,734 pages. GRN requires additional time to evaluate this documentation underlying LDEQ's proposed rule change in order to meaningfully comment on the proposal. This is particularly necessary given that key participants are on summer vacation.

We appreciate your consideration of this request.

Sincerely,

s/Lisa Jordan

Lisa W. Jordan
Counsel for GRN

cc: Jane Watson, EPA VI
Phil Crocker, EPA VI

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